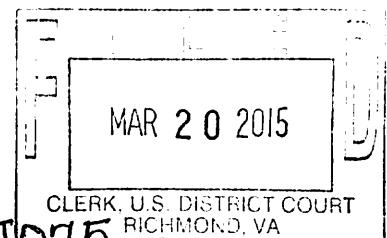


UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia

United States of America)
v.
Brandon Dominic Dandridge)
)
)
)
)

Case No. 3:15MJ075



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 29, 2015 in the county of Henrico in the
Eastern District of Virginia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1709	Theft of Mail Matter by Officer or Employee

This criminal complaint is based on these facts:
See attached Affidavit

Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

Craig Covert
Complainant's signature

Craig Covert, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/20/15

City and state: _____

1st DCJ
Roderick C. Young
United States Magistrate Judge

FEB 2015
MAR 20 2015
CLERK, U.S. DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NO. 1:15-cr-00020-UNA

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT
AND ARREST WARRANT**

CRAIG H. COVERT, after being duly sworn, deposes and state as follows:

1. I am a Special Agent of the United States Postal Service (USPS) Office of Inspector General (OIG) and have been employed in this capacity since January 2007. I have over 22 years of experience as a sworn federal law enforcement officer, having previously served as a criminal investigator/Special Agent for the Naval Criminal Investigative Service (NCIS) and also as a Special Agent for the United States Immigration and Naturalization Service (USINS). Throughout my law enforcement career, I have supervised, conducted, and participated in numerous criminal investigations involving the violation of state and federal statutes. I am a graduate of the Federal Law Enforcement Training Center Criminal Investigator Training Academy and have completed numerous law enforcement training courses throughout my career.
2. I am currently assigned to the Richmond Associate Office, USPS OIG, where I am personally involved in the investigation of this matter. I have been thoroughly trained by the USPS OIG in the methods of investigating and identifying stolen mail and mail matter. This affidavit is based upon my personal investigation and upon my examination of various video, reports, and other records. Because this affidavit is being submitted as support for an arrest warrant, it does not include all the facts that have been learned during the course of the investigation, but sets forth only the facts that your AFFIANT believes are necessary to establish probable cause to believe that a violation of the Title 18, United States Code, section 1709 has been committed by Brandon Dominic DANDRIDGE, a Virginia resident an employee of the United States Postal Service (USPS).
3. DANDRIDGE, last known to reside at _____ was employed as a postal clerk at the Lakeside Branch Post Office (PO), Henrico, VA from 2013 through December, 2014 and is currently on administrative leave. DANDRIDGE was responsible for selling retail products to include stamps and money orders to postal customers as part of his daily duties. Your AFFIANT sets forth the following facts that

establish probable cause to believe DANDRIDGE has violated Title 18, United States Code, section 1709, Theft of Mail by a Postal Employee between May, 2014 to December, 2014.

4. In June, 2014, a postal customer (PC1) contacted the OIG and reported the theft and fraudulent redemption of a \$1,000.00 postal money order purchased on May 1, 2014 at the Lakeside Branch PO. A review of the postal records identified DANDRIDGE as the clerk who sold the money order to PC1. According to PC1, the money order was immediately sealed in an envelope following its purchase and left at the PO for mailing. Investigative queries determined the money order was fraudulently redeemed 2 days later on May 3, 2014. An investigation was subsequently initiated.

5. On July 29, 2014, PC2 reported the theft and fraudulent redemption of 2 postal money orders purchased on June 4, 2014 at the Lakeside Branch PO. The money orders were valued at \$1,000.00 and \$200.00, respectively and were mailed from the Lakeside Branch PO to a local Richmond recipient. After learning the intended recipient never received the money orders, PC2 filed a complaint with the postal service and was advised both money orders had been cashed. According to PC2, the money orders were purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). After purchase, PC2 stepped away from the counter, sealed the money orders into an envelope and deposited them into a lobby collection box. Per Lakeside Branch management, mail deposited into the lobby collection box is retrieved by a postal clerk at the end of the work day, a duty routinely assigned to DANDRIDGE and one other postal clerk. Investigative queries determined the intended recipient's signature was forged on the back of the money orders, after which both money orders were redeemed for cash on June 11, 2014 by clerk 18 (DANDRIDGE) at the Lakeside Branch PO.

6. On August 28, 2014, PC3 reported the theft and fraudulent redemption of 2 postal money orders purchased on July 23, 2014 at the Lakeside Branch PO. The money orders were valued at \$1,000.00 and \$375.00, respectively and were mailed to Eagle Pass, TX, with PC3 filling out both the "payable to" and "from" lines on the money orders. After learning the intended recipient never received the money order, PC3 filed a complaint

with the postal service and was advised both money orders had been cashed. According to PC3, the money orders were purchased from a white male postal clerk, whose identity was corroborated through postal records checks. Upon purchase, PC3 stepped away from the counter, sealed the money orders and handed them back to the same postal clerk (Note: postal clerks place all priority mail handed to them in a single mail tub located behind the counter, which is collected for dispatch at the end of the day by DANDRIDGE or another postal clerk). Investigative queries determined the intended recipient's signature was forged on the back of the money orders, after which both money orders were redeemed for cash the next day on July 24, 2014 by clerk 18 (DANDRIDGE) at the Lakeside Branch PO.

7. In an effort to corroborate that DANDRIDGE was stealing customer money orders, an undercover (UC) OIG agent visited the Lakeside Post Office on September 3, 2014 and purchased 2 separate money orders from DANDRIDGE valued at \$500.00 and \$1000.00 respectively. Following the purchase, the UC agent filled out only the "payable to" line on each money order, sealed them in an envelope and handed them back to DANDRIDGE for placement into the mail flow. Investigative queries determined an illegible signature was subsequently forged on the back of one money order which was fraudulently redeemed 7 days later by postal clerk Shelita COBB, Westhampton Station Post Office, Richmond, VA. Cobb was later identified as a co-conspirator in the scheme, details of which will be addressed in forthcoming paragraphs. The second money order also bore an illegible signature on the back and was redeemed 2 days later at JD Supermarket, a Richmond business.

8. On September 9, 2014, PC4 reported the theft and fraudulent redemption of a postal money order purchased on September 3, 2014 at the Lakeside Branch PO. The money order was valued at \$600.00 and was mailed from the Lakeside Branch PO to Lexington, KY. After learning the intended recipient never received the money order, PC4 filed a complaint with the postal service and was advised the money order had been cashed. PC4 recalled purchasing the money order from a female postal clerk, then stepped away from the counter, sealed the money order into an envelope and handed it back to an unidentified black male clerk for placement into the mail flow before exiting the Post

Office. Investigative queries determined an illegible signature was forged on the back of the money order which was also redeemed for cash 7 days later on September 10, 2014 by postal clerk Shelita Cobb, the same clerk who fraudulently redeemed one of OIG controlled money orders purchased from DANDRIDGE.

9. On September 12, 2014, PC5 reported the theft and fraudulent redemption of a postal money order purchased on August 20, 2014 at the Lakeside Branch PO. The money order was valued at \$460.00 and was mailed from the Lakeside Branch PO to Puerto Rico.

After learning the intended recipient never received the money order, PC5 filed a complaint with the postal service and was advised the money order had been cashed. According to PC5, the money order was purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). PC5 sealed the money order into an envelope and handed it back to DANDRIDGE for mailing before exiting the Post Office. Investigative queries determined an illegible signature was forged on the back of the money order, which was redeemed for cash 6 days later on August 26, 2014 by clerk 18 (DANDRIDGE) at the Lakeside Branch PO.

10. On September 12, 2014, PC6 reported the theft and fraudulent redemption of a postal money order purchased on July 1, 2014 at the Lakeside Branch PO. The money order was valued at \$800.00 and was mailed from the Lakeside Branch PO to New Jersey. After learning the intended recipient never received the money order, PC6 filed a complaint with the postal service and was advised the money order had been cashed. According to PC6, the money order was purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). Upon paying for the money order, PC6 left the blank money order and an unsealed envelope with DANDRIDGE for sealing and subsequent placement into the mail flow before exiting the Post Office. Investigative queries determined the money order was redeemed 7 days later on or about July 7, 2014 at Arash 1, Inc., a Richmond based incorporated business.

11. On September 29, 2014, agents interviewed Denise Miller, DANDRIDGE's former girlfriend. During the interview, Miller alleged DANDRIDGE stole stamp stock from the Post Office in 2013 but stopped bringing it home after he found out the shortages were

causing concern at the Post Office. As for her knowledge of stolen money orders, Miller stated "He said something about his drawer being short." Miller also alleged DANDRIDGE had gone to court in May, 2014 for failure to pay child support and produced several blank money orders as proof of child support payments circa February, 2014. Miller stated the Judge refused to take the money orders as proof of payment since the money orders were blank.

12. On October 3, 2014, PC7 reported the theft and fraudulent redemption of a postal money order purchased on September 5, 2014 at the Lakeside Branch PO. The money order was valued at \$850.00 and was mailed from the Lakeside Branch PO to PC7's landlord in Henrico, VA. After learning the landlord never received the money order, PC7 filed a complaint with the postal service and was advised the money order had been cashed. According to PC7, the money order was purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). PC7 sealed the money order and deposited it into the lobby collection box, the contents of which are collected for dispatch by DANDRIDGE or another postal clerk at the end of the work day. Investigative queries determined an illegible signature was forged on the back of the money order which was redeemed for cash 5 days later on September 10, 2014 by postal clerk and co-conspirator Shelita Cobb, who had also cashed PC4's stolen money order and the previously mentioned OIG controlled money order on the same date.

13. On October 2, 2014, PC8 reported the theft and fraudulent redemption of a postal money order purchased on September 25, 2014 at the Lakeside Branch PO. The money order was valued at \$430.00 and was mailed from the Lakeside Branch PO to Oregon. After learning the intended recipient never received the money order, PC8 filed a complaint with the postal service and was advised the money order had been cashed. According to PC8, the money order was purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). PC8 filled out the "payable to" line with a name but left the rest of the money order blank, sealing it in an envelope and handing it back to DANDRIDGE for placement into the mail flow before exiting the Post Office. Investigative queries determined an illegible signature was forged on the back of

the money order, was redeemed approximately 5 days later at JD Supermarket, a Richmond business.

14. On October 6, 2014, PC9 reported the theft and fraudulent redemption of 2 postal money orders purchased on June 19, 2014 at the Lakeside Branch PO. The money orders were valued at \$1000.00 and \$435.57 respectively and were mailed from the Lakeside Branch PO to Los Angeles, CA. After learning the intended recipients never received the money order, PC9 filed a complaint with the postal service and was advised both money orders had been cashed. According to PC9, the money orders were purchased from a black male postal clerk, although postal records identified him as a clerk other than DANDRIDGE. Following purchase, PC9 stepped away from the counter, filled out the money orders and sealed them in an envelope. However, PC9 could not recall which clerk was handed the mail for placement into the mail flow. Investigative queries determined the money order was subsequently redeemed for cash 1 day after purchase on June 20, 2014 by postal clerk and co-conspirator Shelita Cobb, who had also cashed PC4's and PC7's stolen money orders, and a OIG purchased money order.

15. On October 3, 2014, PC10 confirmed the theft of a postal money order purchased on September 3, 2014 at the Lakeside Branch PO. The money order was valued at \$800.00 and was mailed from the Lakeside Branch PO to a local Henrico, VA address. After learning the money order was never received by the intended recipient, PC10 purchased a replacement money order without determining the status of the original money order, which PC10 assumed was lost. According to PC10, the money orders were purchased from a female postal clerk although PC10 also recalled seeing an unidentified black male postal clerk behind the counter. PC10 recalled sealing the money order in an envelope and depositing it in the lobby collection box, the contents of which are collected for dispatch by DANDRIDGE or another postal clerk at the end of the work day. Investigative queries determined an illegible signature was forged on the back of the money order, which was redeemed for cash 1 week after purchase on September 10, 2014 by postal clerk and co-conspirator Shelita Cobb, who had also cashed PC4's, PC7's and PC9's stolen money orders, and a OIG purchase money order.

16. On October 3, 2014, PC11 reported the theft of a postal money order purchased on September 16, 2014 at the Lakeside Branch PO. The money order was valued at \$200.00 and was mailed from the Lakeside Branch PO to a Puerto Rico. After learning the money order was never received by the intended recipient, PC11 filed a complaint with the postal service and was advised the money order had been cashed. According to PC11, the money order was purchased from a black male postal clerk, identified by postal records as clerk 18 (DANDRIDGE). PC11 recalled sealing the money order in an envelope and leaving it at the Post Office for placement into the mail flow, although PC11 could not recall if it was handed to DANDRIDGE or deposited into the collection box.

Investigative queries determined an illegible signature was forged on the back of the money order, which was redeemed for cash 4 days later on September 20, 2014 at Regency Post Office located in Henrico, VA.

17. On or about November 10, 2014, PC12 reported the theft of a postal money order purchased on November 1, 2014 at the Lakeside Branch PO. The money order was valued at \$500.00 and was mailed from the Lakeside Branch PO to Colorado. After learning the money order was never received by the intended recipient, PC12 filed a complaint with the postal service and was advised the money order had been cashed. PC12 did not discuss the details of the transaction with the OIG. According to postal records, the money order was purchased from clerk 18 (DANDRIDGE). Investigative queries determined the money order was redeemed for cash 6 days later on November 7, 2014, by postal clerk and co-conspirator Shelita Cobb, who had also cashed money orders stolen from PC4, PC7, PC9, PC10 and the OIG.

18. On November 12, 2014, PC13 reported the theft of 2 postal money orders purchased on September 23, 2014 and October 10, 2014 respectively at the Lakeside Branch PO. The money orders were each valued at \$670.00 and were both mailed separately from the Lakeside Branch PO to Columbus, OH. After learning neither money order was received by the intended recipient, PC13 filed a complaint with the postal service and was advised both money orders had been cashed. According to PC13, the money orders were purchased from a female clerk and a white male postal clerk, respectively. PC13 recalled sealing both money orders in their respective envelopes and depositing them in the lobby

collection box, the contents of which are collected for dispatch by DANDRIDGE or another postal clerk at the end of the work day. Investigative queries determined both money orders were redeemed for cash on September 23 and October 10, 2014, respectively by postal clerk and co-conspirator Shelita Cobb, who had also cashed money orders stolen from PC4, PC7, PC9, PC10, PC12 and the OIG.

19. On December 15, 2014, PC14 reported the theft of a postal money order purchased on November 24, 2014 at the Lakeside Branch PO. The money order was valued at \$300.00 and was mailed from the Lakeside Branch PO to the US State Department, Washington, D.C. After learning the money order was never received, PC14 filed a complaint with the postal service and was advised the money orders had been cashed. According to PC14, the money order was purchased from a female clerk, although PC14 recalled an unidentified black male clerk assisted with the transaction. PC14 never took possession of the money order and left it at the counter for one of the assisting sales clerks to place into the mail flow prior to exiting the Post Office. Investigative queries determined the money order was redeemed for cash on 6 days later on December 1, 2014 at the Ampthill Post Office located in southern metro-Richmond, VA. A review of the money order determined the “payable to” line was filled in with the name of Cornilius DANDRIDGE. Investigative queries determined DANDRIDGE has a brother named Carlnealius (aka: Cornilius DANDRIDGE), a convicted felon in the state of VA.

20. Between December 16, 2014 and January, 2015, an unsolicited caller telephonically contacted the OIG to allege Cobb was cashing stolen money orders provided to her by DANDRIDGE. The unsolicited caller was later interviewed by the OIG and agreed to provide additional information if his or her identity was protected. As such, the OIG assigned the caller a registration number (aka: CI). The CI subsequently alleged DANDRIDGE’s brother (Carlneilius Dandridge) was involved in the scheme and had cashed an undetermined number of money orders for DANDRIDGE. The CI stated he or she had had been given several stolen money orders by Cobb, who had obtained them from DANDRIDGE for the purpose of redeeming them for cash. The CI explained that the scheme involved DANDRIDGE stealing money orders from postal customer’s mail, after which he would provide them to several individuals, including Cobb, to cash or

redeem at local Post Offices or check cashing businesses. Your affiant subsequently recovered at least one of the stolen money orders redeemed by the CI, a copy of which is held in the case file.

21. On March 4, 2015, agents interviewed Carlnelius Dandridge (Carlnelius) at the Virginia Probation and Parole Office, Ashland, VA. Carlnelius admitted culpability in the scheme, stating he cashed approximately 6 money orders for his brother, with at least 4 of them through co-conspirator Shelita Cobb at her Post Office. Carlnelius stated Cobb sometimes provided him the cash value of the stolen money order cash when redeemed, although at other times simply exchanged the stolen money orders for an equal value money order she would print out at her register. All money or newly printed money orders were given to DANDRIDGE.

22. On March 7, 2015, Cobb contacted agents wishing to confess to her involvement in the scheme. Cobb stated she had been contacted the day prior by DANDRIDGE about his brother's interview and was ready to resolve the matter. Cobb identified DANDRIDGE as the primary culprit who stole and cashed money orders from customer mail and admitted redeeming up to 18 of those money orders while she worked as a postal clerk. Cobb corroborated Carlnelius's statement made to OIG agents 2 days prior and provided a sworn statement acknowledging her involvement.

23. Based upon the facts and circumstances presented above, your AFFIANT believes there is probable cause to believe that between May and December, 2014, in the Eastern District of Virginia, DANDRIDGE committed a violations of Title 18, United States Code, Sections 1709 and 371, to wit: Mail Theft and Conspiracy. Your affiant respectfully requests that a criminal complaint and arrest warrant be issued in the Eastern District of Virginia for Brandon Dominic DANDRIDGE.

Craig H. Covert

Special Agent Craig H. Covert
U.S. Postal Service
Office of Inspector General

Sworn to and subscribed before me on March 20, 2015.
Richmond, VA

/s/

Roderick C. Young
United States Magistrate Judge